

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)	
)	B/K Case No. 19-01442-dd
Matthew Aaron Welch and)	
Amanda Grace Welch)	
)	Chapter 7
Debtors.)	

APPLICATION TO EMPLOY REAL ESTATE BROKER AND SUB-REAL ESTATE LISTING
AGENT

The Application of Kevin Campbell, Trustee in Bankruptcy for the Estate of the above-captioned Debtors, respectfully represents that:

1. Your Applicant is the duly appointed, qualified and acting Trustee for the Estate of the Debtors in the above-captioned matter.
2. Your Applicant desires to employ and retain BK Global Real Estate Services ("BKRES"), whose address is 1095 Broken Sound Parkway, N.W., Suite 100, Boca Raton, FL 33487 and whose telephone number is (561) 206-0067, to represent him as a Real Estate Broker in the sale of the Debtors' property located at 45 BURLINGTON CIR BEAUFORT, SC 29906 ("PROPERTY").
3. Your Applicant desires to employ and retain Roger Alley of Equity Safe Realty whose address is 83 Sama Point Road, Beaufort, SC 29907 and whose telephone number is 843-263-4562, to represent him as the local licensed Listing Agent in the sale of the Property.
4. BKRES is the primary broker and Equity Safe Realty is the local licensed Listing Agent. BKRES prepares the listing agreement, including the requirement that the property must be sold with the approval of the Bankruptcy Court "as is, where is", without any warranties whatsoever, by quitclaim deed. BKRES advises the Trustee as to what the property should list for and what it may sell for, considering the subject property and the short sale lender's requirements; as well as recommends the additional amount the buyers should pay to be used for the trustee's compensation and expenses and to make a meaningful distribution to the unsecured creditors.
5. Your Applicant desires to compensate BKRES by paying a commission in the amount of six percent (6%) of the sales price obtained on the subject residential property to be paid upon closing of any transaction wherein the real estate agent performs such services. BKRES will pay the Equity Safe Realty from its 6% commission.

6. The property is then marketed by Equity Safe Realty as the local Listing Agent. The local Listing Agent provides local area knowledge and the availability of the Multiple Listing Service (MLS). This combination leads to optimal results.
7. Any contract will be reviewed by BKRES before being submitted to the Trustee for his approval. Once there is a ratified contract, BKRES will submit the contract to the lender and negotiate short sale approval at no cost to the estate.
8. Your Applicant is informed and believes that both BKRES and Equity Safe Realty are disinterested parties within the meaning of that term as it is used in §101(14) of the Bankruptcy Code except that BKRES has been employed by the trustee in past, present and future cases.
9. Your Applicant is informed and believes that BKRES and Equity Safe Realty have no connection with the Debtors, any creditors of the estate, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.

WHEREFORE, your Applicant asks that the Court enter an Order authorizing him to employ BKRES as his Real Estate Broker and Equity Safe Realty as his local Listing agent.

MT. PLEASANT, SOUTH CAROLINA
Dated: July 22, 2019

/s/ Kevin Campbell
KEVIN CAMPBELL, Trustee
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District Court I.D. 30